

1. The Trustee, for the benefit of the chapter 7 estate of Erin Petroleum Nigeria Limited, is hereby allowed and awarded a surcharge under Bankruptcy Code § 506(c) against Zenith Bank Plc and the Zenith Collateral in the amount of \$600,000.00 (the “Surcharge”) though October 3, 2018, without prejudice to any future potential surcharge for any subsequent period as may be established at a hearing on the Motion.

2. Zenith shall pay the Surcharge to the Trustee no later than fourteen (14) days after entry of this Order.

3. In addition to all other rights and remedies, the Surcharge shall be a lien and encumbrance against the Zenith Collateral until paid, which lien and encumbrance shall be senior in priority to the lien of Zenith against the Zenith Collateral (and also superior in priority to any lien against the Zenith Collateral that is junior to Zenith’s lien), but which lien shall be *pari passu* to any lien of Bumi, and which Surcharge and related lien and encumbrance shall bear interest at the rate of five percent (5%) per annum until paid in full.

4. This order shall constitute a perfected lien against the Zenith Collateral to secure the Surcharge, and the Trustee may record or file such other document or instrument as may be advisable to evidence the perfected lien;

5. The Surcharge, the related lien, and other provisions of this Order shall survive the dismissal of Erin Petroleum Nigeria’s bankruptcy case unless the order dismissing the case expressly provides otherwise.

6. The Court shall retain jurisdiction to the maximum extent under applicable law to interpret and enforce this Order.

Dated: _____, 2018

UNITED STATES BANKRUPTCY JUDGE